

REMARKS

Claims 1-4 and 9-14 are pending in this application. By this Amendment, claims 1 and 9 are amended as is the specification. A Request for Continued Examination is attached. No new matter is added. Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representatives by Examiner Motsinger in the March 11, 2008 personal interview. Applicants' separate record of the substance of the personal interview is incorporated into the following remarks.

The Office Action objects to the drawings as failing to show every feature of the subject matter of the pending claims. Specifically, the Office Action objects to the drawings as failing to show a "plurality of planes," as asserted to be recited in claims 2 and 10, and in paragraph 8 of the Office Action. However, this assertion is incorrect. As claims 2 and 10 positively recite a "plurality of blocks" as shown in Figs. 7-9 of the Applicants' disclosure, the drawings sufficiently illustrate every feature of the subject matter of the pending claims. During the March 11 personal interview, the Examiner agreed that the objection is rendered moot by the previous amendment to the claims, as discussed above. Withdrawal of the objection to the drawings is respectfully requested.

The Office Action rejects claims 1-4 and 9-14 under 35 U.S.C. §112, first paragraph, as not enabled. Additionally, the Office Action rejects claims 1-4 and 9-14 under 35 U.S.C. §112, second paragraph, as being indefinite. Applicants respectfully traverse these rejections.

First, the Office Action asserts that the term "selector plane" is not enabled, because it is inconsistent with the applied references. The Examiner further asserted during the personal interview that the above term is inconsistent with its usage in the art. Applicants' specification is amended to overcome this rejection. No new matter is added by these clarifying amendments to the specification.

Second, the Office Action asserts that the CCITT G3/G4 and JBIG2 compression algorithms are not enabled. Specifically, the Office Action asserts that the above algorithms may be applied only to binary data, and are inapplicable to the compression of grey scale data. However, this assertion is incorrect. As discussed in cited Reference V "Digital Image Processing," Gonzalez and Woods, Prentice Hall 2002, page 493 (hereinafter "Gonzalez"), the JBIG and CCITT, as well as ISO, compression standards, as discussed, may be used to compress both binary and grey scale images of up to six grey-coded bits/pixel (on a bit plane basis). During the March 11 personal interview, the Examiner asserted that a subset of the algorithms, as discussed in the Applicants' disclosure, provided for exemplary purposes, may not be enabled. However, as no specific algorithm is positively recited in the pending claims, and the Examiner conceded that the above-discussed algorithms may be applied to grey scale image compression, the Applicants' disclosure is enabling. During the personal interview, the Examiner agreed that Applicants' claims are enabled. The pending rejection under 35 U.S.C. §112, second paragraph, is likewise overcome.

The Office Action rejects claims 1, 2, 4, 9, 10 and 12-14 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,917,952 to Noh in view of U.S. Patent No. 6,400,844 to Fan et al. (hereinafter "Fan"). The Office Action rejects claims 3 and 11 under 35 U.S.C. §103(a) as being unpatentable over Noh, in view of Fan and cited Reference U Kodidis, Eleftherios et al. "Nonlinear Adaptive Filters for Speckle Suppression in Ultrasonic Images," Signal Processing, Signal Processing v 52 n3 August 1996, pp. 357-372 (hereinafter "Kodidis"). Applicants respectfully traverse these rejections.

The Office Action asserts that Noh teaches converting binary image data into grey scale image data. However, Noh cannot reasonably be considered to teach, or to have suggested, converting source binary image data into grey scale image data, as positively recited in the pending claims. Noh teaches the conversion of grey scale image data to lower

resolution grey scale image data or binary image data, as discussed in col. 2, lines 24-33. Noh teaches that a dithering process may be applied to convert high resolution grey scale image data to low resolution grey scale image data directly, or indirectly, to binary image data.

During the March 11 personal interview, the Examiner asserted that Noh teaches an intermediate undithering process, which may be used to increase the resolution of image data during the execution of the above-discussed algorithm. However, as Noh teaches converting a source grey scale image to either lower resolution grey scale images or binary images, thereby effectively lowering the resolution of a source image, any intermediate undithering or resolution increasing operation that may be asserted to be present in Noh, is moot in regard to the above source conversion process. The Examiner further agreed with Applicants' representatives regarding the above features. Therefore, as Noh teaches converting a higher resolution grey scale image to a lower resolution grey scale image or to a binary image, Noh cannot reasonably be considered to teach, or to have suggested, the above-discussed feature. Further, Fan and Kodidis fail to overcome the deficiencies in the application of Noh to the subject matter of the pending claims.

For at least the above reasons, Noh, Fan and Kodidis cannot reasonably be considered to have suggested the combinations of all of the features positively recited in independent claims 1 and 9. Claims 2-4 and 10-14 would not have been suggested by any permissible combination of the applied references for at least their respective dependence on allowable base claims, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejections of the pending claims, as discussed above and enumerated in the Office Action, are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-4 and 9-14 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:

Request for Continued Examination

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